

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION AT DAYTON**

UNITED STATES OF AMERICA

CASE NO. 3:15-CR-00148

Plaintiff,

JUDGE ROSE

vs.

CONNIE M. APOSTELOS

MOTION TO MODIFY BOND

Defendant.

Now comes the Defendant, **CONNIE M. APOSTELOS**, by and through her attorneys, **RION, RION & RION, L.P.A., INC.**, and hereby respectfully moves this Honorable Court for an Order modifying the conditions of bond by removing her from Electronic Home Detention Program or in the alternative placing her on a curfew to allow her to attend doctor appointments, handle day to day affairs for the household and take care of the parties' pets.

Respectfully submitted,

/s/ Jon Paul Rion

JON PAUL RION (#0067020)
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CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that a copy of the foregoing was sent to the office of the United States Attorney on the same day of filing.

//s// Jon Paul Rion

**JON PAUL RION
RION, RION & RION, L.P.A., INC.**

